

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

In re:

Wisconsin & Milwaukee Hotel LLC,

Debtor.

Case No. 24-21743-gmh

Chapter 11

**THIRD SUPPLEMENTAL DECLARATION OF MICHAEL P. RICHMAN
UNDER BANKRUPTCY RULE 2014**

I, Michael P. Richman, hereby declare as follows:

1. I am a member of the law firm of Richman & Richman LLC, whose offices are located at 122 W. Washington Avenue, Suite 850, Madison, Wisconsin, 53703. I submit this Third Supplemental Declaration of Michael P. Richman Under Bankruptcy Rule 2014, pursuant to Fed. R. Bankr. P. 2014(a), and in further support of the original Notice and Application of Debtor for Authority to Retain and Employ Richman & Richman LLC as Counsel for the Debtor Effective as of April 10, 2024 (the “**Application**”) [Doc 10], of Wisconsin & Milwaukee Hotel LLC, the debtor herein (“**Debtor**” or “**WMH**”).

2. I make this Third Supplemental Declaration¹ in order to disclose additional connections, within the meaning of Rule 2014, that became recently known to me. The facts set forth herein are based on my personal knowledge. To the extent

¹ Previous Declarations of Michael P. Richman were filed in this matter as follows: Declaration of Michael P. Richman Pursuant to F.R.B.P. 2014(a) and in Support of Notice and Application of Debtor for Authority to Retain and Employ Richman & Richman LLC as Counsel for the Debtor Effective as of April 10, 2024 filed on April 10, 2024 [Doc 10 – Exhibit A]; First Supplemental Declaration of Michael P. Richman Under Bankruptcy Rule 2014 filed on April 25, 2024 [Doc 76]; and Second Supplemental Declaration of Michael P. Richman Under Bankruptcy Rule 2014 filed on February 18, 2025 [Doc 408].

any information disclosed in this Declaration requires amendment or modification as additional information becomes available, an additional supplemental declaration will be submitted to the Court.

3. On March 28, 2025, my law partner and spouse Claire Ann Richman was appointed to the panel of Chapter 7 trustees by Adam Brief, Acting United States Trustee for Region 11.

4. On June 6, 2025, in conjunction with plan confirmation hearings beginning July 21, 2025, Computershare Trust Company, N.A. and Wisconsin & Milwaukee Hotel Funding LLC (together, the “**Lenders**”), filed their Witness List for Hearing Beginning July 21, 2025 Regarding Confirmation of Debtor’s Proposed Amended Chapter 11 Plan of Reorganization (“**Lenders’ Witness List**”) [Doc 585].

5. Among the witnesses identified (and designated as an expert) in the Lenders’ Witness List is Cynthia Nelson, a Senior Managing Director of FTI Consulting, Inc. (“**FTI**”).

6. My son Joseph F. Richman is a Managing Director of FTI. He knows Ms. Nelson and has worked with her on a variety of past FTI engagements. He is aware from ordinary discussions with me generally of my work in this case, but I have not discussed the specifics of any particular issues with him. He has not discussed this chapter 11 case with Ms. Nelson, and has informed me he will not do so.

7. In addition, FTI was a candidate for the position of Debtor’s financial advisor in this case, and the Debtor interviewed representatives of FTI at the outset of this chapter 11 case (but not Ms. Nelson).

I declare under penalty of perjury under the laws of the United States that, based upon my knowledge, information and belief as set forth in this Third Supplemental Declaration, the foregoing is true and correct to the best of my knowledge.

Executed in Madison, Wisconsin this 10th day of June, 2025.

A handwritten signature in blue ink, appearing to read 'Michael P. Richman', is written over a horizontal line.

Michael P. Richman